

REILLY POZNER LLP
1900 16th Street, Suite 1700
Denver, Colorado 80202
Telephone: (303) 893-6100
Facsimile: (303) 893-6110
Michael A. Rollin

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re : **Chapter 11 Case No.**
:
LEHMAN BROTHERS HOLDINGS INC., et al. : **08-13555 (JMP)**
:
Debtors. : **(Jointly Administered)**

X

**DECLARATION OF KERI REED IN SUPPORT OF
DEBTORS' REPLY TO U.S. BANK'S RESPONSE TO DEBTORS'
NINETY-EIGHTH, NINETY-NINTH, AND ONE HUNDRED AND NINTH
OMNIBUS OBJECTIONS TO CLAIMS (INSUFFICIENT DOCUMENTATION)**

Pursuant to 28 U.S.C. §1746, I, Keri Reed, declare:

1. I am over 18 years of age and have personal knowledge of all of the facts set forth in this declaration and if called upon to testify as a witness, I could testify to the truth of the matters set forth herein.

2. I submit this Declaration in support of *Debtors' Reply to U.S. Bank's Response to Debtors' Ninety-Eighth, Ninety-Ninth, and One Hundred and Ninth Omnibus Objections to Claims (Insufficient Documentation)* ("Objection"), ECF No. 18088.

3. I am an Assistant Vice President of LAMCO LLC. LAMCO LLC is a non-debtor subsidiary of Lehman Brothers Holdings Inc. ("LBHI") that has been charged with managing LBHI's assets. I have held this position since September 2010.

4. As a part of my duties as Assistant Vice President, I have contacted U.S. Bank to request loan-level data to support its claims against Debtors in order to permit the

Debtors to evaluate the validity of such claims.

5. LAMCO, on behalf of Debtors, first contacted U.S. Bank to request information in early August, 2010. I requested data supporting their proofs of claims in order to permit Debtor to determine the validity of such claims. I requested both qualitative and quantitative data including but not limited to: the seller loan number; the buyer loan number; the servicer loan number and servicer name; the type of claim, i.e., misrepresentation of value; the address of the real property securing the mortgage loan; unpaid principal balance on the loan; and the status of the loan.

6. I, or someone on behalf of Debtors, have requested data from U.S. Bank numerous times since August, 2010.

7. As of January, 2011, U.S. Bank had not provided sufficient documentation in support of its claims to permit Debtors to evaluate the claims' validity.

8. U.S. Bank has approximately one million mortgage loans at issue in its claims against Debtors.

9. Of the active loans for which U.S. Bank currently serves as trustee, approximately 67% are performing.

10. Of the 727 loans for which U.S. Bank has identified a breach of a representation and warranty, at least 38 of those loans were Transferor-Originated Loans.

11. Of the approximately one million loans for which U.S. Bank serves as trustee, U.S. Bank has provided document exceptions for approximately 261,000 loans, approximately 26% of its entire loan population.

12. As recently as April 25, 2011, U.S. Bank sent remittance reports to its certificate holders in 60 trusts at issue in U.S. Bank's claims. In each of these remittance reports, U.S. Bank informed its certificate holders that "U.S. Bank National Association in its respective capacity under the transaction documents is not aware of any material breaches."

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated: June 28, 2011

/s/ Keri Reed

Keri Reed